

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**GOOGLE LLC,**

*Plaintiff,*

**v.**

**SONOS, INC.,**

*Defendant.*

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**CIVIL ACTION 3:20-cv-06754-WHA**

**SONOS, INC.’S OBJECTIONS AND RESPONSES TO  
GOOGLE LLC’S SECOND SET OF REQUESTS FOR PRODUCTION (NOS. 43-89)**

Sonos, Inc. (“Sonos”) responds to Google LLC’s (“Google”) second set of requests for production (Nos. 43-89) as follows.

**GENERAL OBJECTIONS**

Sonos asserts each of the following General Objections to each of Google’s requests for production. In addition to these General Objections, Sonos may also state Specific Objections to specific requests for production where appropriate. By setting forth such additional Specific Objections, Sonos does not in any way intend to limit or restrict its General Objections. Moreover, to the extent Sonos provides a response to any of Google’s requests for production to which Sonos objects, such response shall not constitute a waiver of any General or Specific Objection.

1. Sonos’s responses to Google’s Second Set of Requests for Production (Nos. 43-89) are made to the best of Sonos’s present knowledge, and Sonos reserves the right, at any time, to revise, correct, supplement, modify, or clarify the specific responses set forth below or the information disclosed therein. Discovery is in the early stages, and Sonos

Sonos objects to the Request to the extent that it calls for material protected from discovery by attorney-client privilege, the work product doctrine, or any other applicable privilege.

Sonos objects to the Request to the extent that it calls for material that is publicly available or otherwise equally available to Google.

Sonos objects to the extent the Request purports to call for documents outside Sonos's possession, custody, or control, such as Sonos's law firms' document retention policies.

Subject to these Specific Objections and the foregoing General Objections, and insofar as this request is understood, Sonos is not aware of any working examples of Sonos products or Sonos prototypes that practice the subject matter claimed in the '033 patent.

Sonos reserves the right to revise, correct, add to, supplement, or clarify its response to this Request for Production as additional information is discovered and/or becomes available.

#### **REQUEST FOR PRODUCTION NO. 58**

*Document relating to conception, design, development, and implementation of the Cloud Queue API mentioned on your website at <https://developer.sonos.com/reference/cloud-queue-api/>.*

#### **RESPONSE**

Sonos objects that the Request is overbroad, unduly burdensome, and not calculated to lead to the discovery of relevant documents, particularly to the extent that the Request requests documents regardless of time or whether they relate to any issue in this case.

Sonos objects to the Request to the extent that it calls for material protected from discovery by attorney-client privilege, the work product doctrine, or any other applicable privilege.

Sonos objects to the Request to the extent that it calls for material that is publicly available or otherwise equally available to Google.

Sonos objects to the extent the Request purports to call for documents outside Sonos's possession, custody, or control, such as Sonos's law firms' document retention policies.

Subject to these Specific Objections and the foregoing General Objections, and insofar as this request is understood, Sonos responds that it is willing to meet and confer with Google to understand what is sought by this request and how it is relevant to any issues in this case.

Sonos reserves the right to revise, correct, add to, supplement, or clarify its response to this Request for Production as additional information is discovered and/or becomes available.

#### **REQUEST FOR PRODUCTION NO. 59**

*Source code for the Cloud Queue API mentioned on your website at <https://developer.sonos.com/reference/cloud-queue-api/>, including the first version of the code.*

#### **RESPONSE**

Sonos objects that the Request is overbroad, unduly burdensome, and not calculated to lead to the discovery of relevant documents, particularly to the extent that the Request purports to require the production of versions of source code that are not purportedly relevant to any issue in this case.

Sonos objects to this request to the extent it seeks documents that involve third-party confidentiality interests and potential obligations of Sonos related to such third-party confidentiality interests.

Subject to these Specific Objections and the foregoing General Objections, and insofar as this request is understood, Sonos responds that it is willing to meet and confer with Google to understand what is sought by this request and how it is relevant to any issues in this case.

Sonos reserves the right to revise, correct, add to, supplement, or clarify its response to this Request for Production as additional information is discovered and/or becomes available.

Dated: December 27, 2021

Respectfully submitted,

By: /s/ Cole B. Richter

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